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10 *Enjoy Punta del Este Resort & Casino*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 BALUMA S.A. doing business as ENJOY
14 PUNTA DEL ESTE & CASINO,

15 Case No.: 2:20-cv-01642-JCM-DJA

16 Plaintiff,

17 vs.

18 BRIAN POFF II,

19 Defendant.

20 **STIPULATION AND [Proposed]
21 ORDER EXTENDING DEADLINE TO
22 SUBMIT JOINT PRETRIAL ORDER**

23 **[First Request]**

24 Pursuant to Local Rule IA 6-1(a), IA 6-2, and 7-2, Plaintiff Baluma S.A., doing business
25 as Enjoy Punta Del Este Resort & Casino (“Baluma”) and Defendant/Counterclaimant Brian Poff,
26 II (“Poff”), by and through their respective undersigned counsel of record, hereby stipulate, agree
27 and request that the Court enter an order extending the deadline for the parties to submit a Joint
28 Pretrial Order as contemplated LR 26-1(b)(5) and the Court’s Scheduling Order (ECF 12) by 40
days for the reasons set forth herein. This is the parties’ first request for an extension of time to
submit their Joint Pretrial Order.

29 1. On March 9, 2022, this Court entered an Order (ECF 27) granting in part and
30 denying in part Baluma’s Motion for Summary Judgment (ECF 14).

31 2. As a result of the Order on Baluma’s Motion for Summary Judgment and pursuant
32 to the Court’s Scheduling Order (ECF 12), the parties’ deadline to file a Joint Pretrial Order as
33 contemplated by LR 26-1(b)(5) is currently April 8, 2022.

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1 3. On April 6, 2022, counsel for Poff made his initial appearance in this action filing
2 a Notice of Appearance (ECF 28).

3 4. The parties' counsel are currently engaged in settlement discussions that would
4 resolve this case in its entirety if successful.

5 5. In light of Poff's counsel recent appearance in the case and the parties' ongoing
6 settlement discussions, the parties believe that good cause exists for an extension of time and
7 therefore respectfully request a 40-day¹ extension of time to submit a Joint Pretrial Order,
8 extending such deadline until May 18, 2022.

9 **IT IS SO STIPULATED.**

10 Dated this 7th day of April 2022

11 **GREENBERG TRAURIG, LLP**

12 _____
13 /s/ *Christopher R. Miltenberger*
14 CHRISTOPHER R. MILTENBERGER
15 Nevada Bar No. 10153
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19 Attorneys for Plaintiff

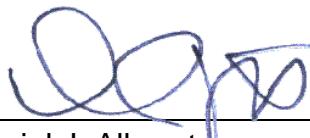
20 Dated this 7th day of April 2022

21 **CARBAJAL LAW**

22 _____
23 /s/ *Hector J. Carjajal II*
24 HECTOR J. CARBAJAL II
25 Nevada Bar No. 6247
26 10001 Park Run Drive
27 Las Vegas, Nevada 89145
28 Attorney for Defendant

17 Good cause appearing,

18 **IT IS SO ORDERED.**

19 
20 _____
21 Daniel J. Albregts
22 United States Magistrate Judge

23 DATED: April 8, 2022

24
25
26
27 _____
28 ¹ The parties would have requested a 30 day extension through May 8, 2022, but Mr. Carbajal will be out of the
country through May 12, 2022. Thus, the parties have requested an additional ten (10) days to accommodate Mr.
Carbajal's being out of the country.